

EXHIBIT C

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, NY 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

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December 12, 2013

Via E-mail

Lauren Hoelzer Helenek,
Weil, Gotshal & Manges LLP,
767 Fifth Avenue,
New York, New York 10153-0119.

Re: *In re Lehman Brothers Holdings Inc., et al.* 08-13555 (Bankr. S.D.N.Y.);
Lehman Brothers Holdings Inc. and Lehman Brothers Special Financing,
Inc. v. Giants Stadium LLC 13-01554 (Bankr. S.D.N.Y.)

Dear Lauren:

I write on behalf of Giants Stadium LLC (“Giants Stadium”) regarding several discovery issues that pre-date Debtors’ commencement of the adversary proceeding against Giants Stadium.

Copies of Lehman Brothers, Inc.’s (“LBI”) productions of documents to Giants Stadium were provided to Debtors on June 6, 2013, August 22, 2013, and September 19, 2013 (“LBI Productions”). Giants Stadium received the LBI Productions pursuant to an agreement that LBI would voluntarily produce documents in lieu of Giants Stadium pressing its motion for a subpoena. However, on September 20, 2013, LBI requested on Debtors’ behalf that Giants Stadium suspend review of the LBI Productions pending Debtors’ review of the LBI Production, potentially followed by a request from Debtors to LBI to clawback certain documents from the LBI Production on the basis of privilege. It has now been more than six months since Debtors’ receipt of the first of the LBI Productions and more than 11 weeks since Giants Stadium suspended review of those productions pending Debtors’ potential claw-back request. Particularly in light of the fact that the confidentiality agreement between Giants and Debtors contemplates that clawback requests are to be made in writing within five business days of discovering that privileged material was inadvertently produced, Giants Stadium requests that Debtors provide a list of documents they believe are privileged, along with the basis for claiming privilege over each such document, by January 3, 2014. After this date, Giants Stadium will assume that Debtors do not choose to assert privilege over any unidentified documents and will resume review of those documents. Giants Stadium reserves all rights relating to this issue, including the right to contest any claw-back requests by Debtors on all applicable grounds, including timeliness.

Lauren Hoelzer Helenek, Esq.

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Additionally, as Giants Stadium has not had access to the LBI Productions for several months, Giants Stadium has been unable to finalize its assessment of the sufficiency of the productions made to date by Debtors and by LBI. However, in an effort to move the discovery process toward completion, Giants Stadium requests at this time that Debtors search for and produce any responsive, nonprivileged documents from the files of the following custodians, whom Giants Stadium named in its August 13, 2013 letter as potential deponents, or confirm that such files were already searched and yielded no unique responsive, non-privileged documents: Kyle Ingram; Jeffrey Kirshenbaum; Julia Nand; Sean Teague; and Jacopo Visentini.

Finally, please confirm that Debtors have produced all nonprivileged, responsive documents from the files of the custodians that Debtors have already agreed to search. Specifically, Giants Stadium is aware of an e-mail dated September 18, 2008 from Robert Taylor to Christine Procops which has not yet been produced by Debtors (compare GSAMP_LB_23298 with LBSF00000187). Giants Stadium is also aware that hard copies of the swap termination notices were hand delivered to Lehman on September 18, 2008, and yet Debtors have not produced copies of those notices or any records of their receipt on that date by Lehman. Further, Giants Stadium notes that, out of the nearly ten thousand documents that Debtors have produced, only a handful post-date October 15, 2008, despite the fact that some documents responsive to several of Giants Stadium's requests (including Request Nos. 10-17) likely were created after that date. Giants Stadium also notes that Debtors have apparently still not produced any documents responsive to Request 17(ii), which, as was explained during the parties' meet and confer of April 30, 2013, seeks information on Lehman's approach to valuing "Loss" on other actual bond rate swaps. Please review these insufficiencies and promptly produce any additional non-privileged documents, including documents that post-date October 15, 2008, that are responsive to these or any of Giants Stadium's other document requests.

Giants Stadium is willing to meet and confer on these issues. Please notify me by the close of business on Friday, December 13, 2013, as to Debtors' availability to meet and confer during the next week.

Sincerely,



Matthew A. Schwartz